

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,
Plaintiff,

v.

Crim. No. 04-10167

TIMOTHY HERLIHY,
Defendant.

DEFENDANT'S MOTION TO AMEND CONDITIONS OF RELEASE

Now comes the Defendant, Timothy Herlihy, and pending disposition of this case on July 21, 2005, moves this Court to amend the conditions of his release to permit him to live with his father at 19 Tibbetts Ave., Danvers, Massachusetts, subject to whatever additional conditions may be recommended by Pretrial Services.

by his attorneys,

Date: June 28, 2005

/s/ Matthew A. Kamholtz
Matthew H. Feinberg
BBO #161380
Matthew A. Kamholtz
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FEINBERG & KAMHOLTZ
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was this day served upon the following attorney(s) of record, via electronic/ first class mail:

David Tobin, AUSA
United States Attorney's Office
Suite 9200
One Courthouse Way
Boston, MA 02210

Date: June 28, 2005

/s/ Matthew A. Kamholtz
Matthew A. Kamholtz